

Mayer Brown LLP 1999 K Street, N.W. Washington, DC 20006-1101 United States of America

> T: +1 202 263 3000 F: +1 202 263 3300

> > mayerbrown.com

Alex H. Vincent
Environmental Technical Advisor
T: +1 202 263 3345

avincent@mayerbrown.com

February 24, 2020

BY FOIAONLINE

National FOIA Office U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW (2310A) Washington DC 20460

Re: FOIA Request submitted on FOIAonline.gov

Dear National FOIA Officer::

Through submittal of this letter and attachment to FOIAonline.gov, I am writing to request the U.S. Environmental Protection Agency records concerning, among other things, the detections of per- and polyfluoroalkyl substances ("PFAS") in groundwater and drinking water resources in the City of Parchment, Michigan and portions of Cooper Charter Township, Kalamazoo County, as further defined and described in the attached detailed description of the requested records.

I agree to pay the cost of the retrieval and duplication of these records; however, please contact me if the fee and charges are expected to exceed the \$500 authorization entered online so that I may provide additional authorization. Should you have any question, please contact me at 202-263-3345 or avincent@mayerbrown.com.

Sincerely,

Alex H. Vincent

Environmental Technical Advisor

Att.

February 24, 2020

Requested documents:

- 1. Documents concerning per-and polyfluoroalkyl substances (PFAS) concentrations that have been detected in the municipal water supply of the City of Parchment, Michigan (PWS ID MI0005200) ("Parchment Well Field"), which is located on North 20th Street and Section 34, Township 1South, Range 11West in Cooper Charter Township ("Cooper Township"), Kalamazoo County. Documents should include analytical laboratory data and QA/QC data in electronic data deliverable (EDD) files or other electronic database files, if available. At a minimum, analytical laboratory data reports should be provided, preferably in pdf format.
- 2. Documents concerning PFAS concentrations that have been detected in residential drinking water wells, water supply wells, irrigation wells, groundwater, monitoring wells or surface water in the southeastern portion of Cooper Township, Kalamazoo County (defined for this request as the areas of Cooper Township east of the Kalamazoo River and south of Spring Brook/Spring Brook Drain) or in the City of Parchment. Documents should include addresses or otherwise identify or depict the locations of collected and analyzed samples. Documents should include analytical laboratory data and QA/QC data in electronic data deliverable (EDD) files or other electronic database files, if available. At a minimum, analytical laboratory data reports should be provided, preferably in pdf format.
- 3. Hydrogeologic investigations and groundwater, sediment, surface water, and drinking water quality investigations associated with detections of, and potential sources of, PFAS concentrations in the southeastern portion of Cooper Township and the City of Parchment, Kalamazoo County. Documents should include analytical laboratory data and QA/QC data in electronic data deliverable (EDD) files or other electronic database files, if available. At a minimum, analytical laboratory data reports should be provided, preferably in pdf format.
- 4. Documents concerning U.S. EPA's response to the detection of PFAS in the Parchment Well Field and groundwater and drinking water resources in the City of Parchment and the southeastern portion of Cooper Township, including communications, correspondence, consultation, and coordination with local and state agencies (e.g., City of Kalamazoo, Kalamazoo County, Cooper Township, City of Parchment, Michigan Department of Health and Human Services, Michigan Department of Environmental Quality, Michigan Department of Environment, Great Lakes and Energy, Michigan Department of Natural Resources, and the Michigan PFAS Response Action Team) during the response to the PFAS contamination of groundwater and the Parchment Well Field and during the evaluation, testing, and approval of alternative water supplies from the City of Kalamazoo.

USEPA FOIA Parchment PFAS 736202452

February 24, 2020

- 5. Documents concerning the Parchment Well Field, including its operation (well information, pumping rates, aquifer performance testing, and groundwater elevations), and hydrogeologic conditions.
- 6. Safe Drinking Water Act violations of maximum contaminant levels during drinking water quality testing data conducted by the PWS, including "raw" and "finished" water analyses.
- 7. Documents concerning Wellhead Protection Area evaluations of the Parchment Well Field, groundwater resources in the City of Parchment or in the southeastern portion of Cooper Township, including the wellhead protection study entitled *City of Parchment Wellhead Protection Program Report* prepared by G.E. Jones or Consulting Engineering in 1992.
- 8. Documents concerning groundwater resources assessments or drinking water supply source assessments in the City of Parchment or the southeastern portion of Cooper Township.
- 9. Documents concerning evaluations of the susceptibility to potential contamination of the Parchment Well Field or of the drinking water supplies or groundwater resources in the City of Parchment or southeastern Cooper Township.
- 10. Documents concerning the Crown Vantage Corporation's former paper mill in the City of Parchment and Cooper Township, Kalamazoo County, Michigan, including manufacturing, waste management, landfilling, wastewater treatment and discharge, permitting, regulatory compliance, and brownfields redevelopment. The primary address of the former paper mill was 100 Island Avenue, Kalamazoo, MI 49004; however, other addresses have been associated with either the facility or its files including: 530 South Riverview Drive, 550 South Riverview Drive, 582 South Riverview Drive, 107 N. Wilson Avenue, 127 N. Wilson Ave, and Lottie Drive. A map is included for reference. EPA site identification numbers have included: EPA ID: MID982639981, MIK101844575, MIN000508498, and MID000810630; SEMS: 0508498, RCRA: MID000810622, and TSCA: 61789659. Other owner/operators associated with the site or its files include: Kalamazoo Vegetable Parchment Company, KVP-Sutherland Paper Company, Brown Company, Gulf & Western Industries/Gulf & Western Corporation, James River Paper Company, Inc./James River Corp., Sibille-Dalle, Crown Vantage Paper Company, Inc./Crown Paper Company, Inc./Crown Vantage Corporation, American Paper Mills, and River Reach Partners LLC.









